

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

RECEIVED

LEROME BRANTLEY 224918Full name and prison number
of plaintiff(s)

MAY - 7 P 12:32

v.

DEBRA P. HACKETT, CIVIL ACTION NO. 2:18-cv-471-MHT
U.S. DISTRICT COURT (To be supplied by Clerk of
MIDDLE DISTRICT ALA. U.S. District Court)Warden Cooks, Warden Thomas,Captain King, Lt. Pittman, officerN. Thomas, officer E. Burkett,officer J. Whitten, Sgt. Briggs, officer F.Harris, officer Griffin, officer J. Black etc.Name of person(s) who violated
your constitutional rights.
(List the names of all the
persons.)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES () NO (✓)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES () NO (✓)
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:
Plaintiff(s) _____

Defendant(s) _____

2. Court (if federal court, name the district? if state court, name the county) _____

3. Docket number N/A
4. Name of judge to whom case was assigned N/A
5. Disposition (for examples Was the case dismissed?
Was it appealed? Is it still pending?) N/A
6. Approximate date of filing lawsuit N/A
7. Approximate date of disposition N/A

II. PLACE OF PRESENT CONFINEMENT Fountain Correctional Facility

PLACE OF INSTITUTION WHERE INCIDENT OCCURRED Draper Correctional Facility

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
1.	WARDEN Mary Cooks	Fountain Correctional Facility
2.	WARDEN Thomas	Kilby Correctional Facility
3.	Lt. V. Pittman	N/A
4.	Officer N. Thomas	N/A
5.	Officer E. Burkett	N/A
6.	Officer J. Whitten	Kilby Correctional Facility

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED February 18, 2018

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR-ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Cruel and unusual Punishment/Excessive Force

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

On february 18, 2018 at 1:40 a.m., officers N. Thomas, E. Burkett, J. Whitten, and officer griffin entered H-dorm at draper correctional facility. Officer N. Thomas came straight to the living quarters I was assigned to (lights off) and said: "give me the phone." He had me take my pants off, pop my boxers, turn around to be handcuffed, and then took me to the other side of the living area to squat twice, (continued on extra page)

GROUND TWO: Cruel and unusual punishment/Refused/improper medical care (Also continued facts supporting Ground one Page 1 and 2)


SUPPORTING FACTS: At Kilby correctional facility I saw a sick call screening nurse on 2-26-18 after 12 a.m. That told me I would be put in to see some one about my pain. I never saw anyone, even on the next day as their regular procedures are to take you to see someone, They didn't take me or the inmate next to me, (which they said he sign up to much) I also explained this in letter to warden Thomas, and received no response.

GROUND THREE: Cruel and unusual Punishment/ Not guaranteeing my safety

SUPPORTING FACTS: Officer N. Thomas, Lt. Pittman, Captain King, and several officials that worked at draper correctional facility made it clear that it was an conspiracy using me (Leome Brantley, the third shift runner at that time) to try to catch officer M. Johnson up in something she had been being investigated for, before I even started working out there. They stated they been knew/was aware of what was going on. Officer N. Thomas stated but they wasn't worried about it because of draper shutting down.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

To be awarded/ ~~paid~~ the amount of \$1,000,000.⁰⁰ And the
dismissal of all the officials that Participated in this Conspiracy/ Excessive
force carried out on me.




signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true
and correct.

EXECUTED on 4-24-18

(Date)



signature of plaintiff(s)

Continued Facts supporting Ground One

While officers Whitten, and Burkett shook down the living area. When we left the living area, and officer N. Thomas saw the phone in my hand, while walking behind me, he grabbed it, and I immediately stated: "You can get the phone, just let me talk to you." (I said this twice, I know) Officer N. Thomas was bending my hand and arm on the right side, officer E. Burkett was on the left side bending and twisting my arm, while officer J. Whitten had me in a choke hold choking me out, while still handcuffed with my arms behind my back, while they forced me down on the ground. Officer N. Thomas said to spray me with the mace, but the inmates in H-dorm was up then and stated: "Ya'll aint got to do all that, he already in handcuffs". Then they got me up and took me out to the shift office. When we entered the shift office officer N. Thomas told me, I alt to fire your ass up, you hurt my something/heart to write me up for assault. I told him I was only trying to keep them from slamming my face to the ground. I wasn't angry, or aggressive in anyway, and he agreed. I told officer N. Thomas in the presence of officers Whitten, and Burkett, that I was going to file a lawsuit, and I explained what I meant to officer Whitten, and Burkett. Officer N. Thomas stated: "I don't blame you, but I know how to write it up." I was taken, and locked in the inmate barbershop from something to 2a.m. until after 5a.m. still handcuffed behind my back until they (Lt. Pittman, Lt. Davis etc.) finished their shakedown/investigation of the officer (M. Johnson) they were trying to catch/and til after they fed breakfast. [Officer N. Thomas told me (Lerome Brantley, the third shift runner, during this conspiracy) that nothing probably will be done to me. They just want my girlfriend/the head; And that the hit on me came from the warden (warden cooks)] officer N. Thomas took me to Staton Correctional Facility (Healthcare) for a body chart, and I explained to nurse Wright, and Anthony about the situation as they took note of bruises etc. (Lt. Pittman, (the shift commander) or anyone didn't take pictures of me at draper, nor was I given any medication) I was brought back to draper from staton healthcare, and locked right back up in the inmate barbershop until well after 6 a.m. shift change. I asked Lt.

Pittman could I use the bathroom, and she said I would come out when she let me out. I told her I've been in here all night, I'm hurting, and you're not going to let me use the bathroom. She said I don't care! you'll get out when I let you out. Captain King came out of the shift office asking what's all your fuss about? I said I'm hurting, and I need to use the bathroom. She said we'll let you out. I still had to wait an hour or so, because officer W. Thomas left with the keys to the inmate barbershop, and captain King held me before she let me go to the bathroom. Captain King was insisting that officer M. Johnson was in love with me, as the reason for her not communicating in a certain manner with other officers like she use to, and that it was my fault that she was about to lose her job. I started crying, and told captain that ninety percent of our conversations were about God, and all I ever did was tell her the right thing, and try to help her. After Captain King plainly insisting that it was my fault that all the officers turned against officer M. Johnson because she wouldn't do what they wanted her to do anymore sexually etc., and lying/saying all kinds of things to the Lt. I worked for as the runner (Lt. Pittman) and officials turning them all against us both. She told me if I wanted to help her not to say anything, and that I was I about to go to Kilby lock up under investigation. I stated: I aint nothing to say. Shortly after, captain King transferred to Kilby correctional facility working there. I was held in Kilby lock up from 2-18-18 until being transferred to Fountain Correctional Facility on 4-9-18 where the same warden that was at draper cor. fac. (warden cooks). while at Kilby I communicated with several officials, all the way up to warden Thomas/sending him a letter informing him on 3-26-18 about my constitutional rights that had been violated before I left draper, and since being at Kilby. Warden Thomas never came back through segregation after 3-20-18 after telling me they would have to do something for violating the disciplinary procedures. I was refused proper medical treatment while in segregation at Kilby correctional facility, and held in the Segregation unit after the disciplinary hearing was void on 3-20-18. Also draper officers came through after shutting it down/to work at Kilby, where multiple comments/teasing actions were made to me. And I'm still being treated improperly here at Fountain by officers etc., in which I can't help but believe it's coming from the same warden that was at draper cor. fac. involved in the conspiracy there.

LeRome Brantley
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Montgomery County Circuit Clerk
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